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Office of the Secretary, TW-A325
Federal Communications Commission
445 Twelfth Street SW
Washington, D.C. 20554

RE: RM-9260, Class A Status for LPTV Stations
MM Docket No. 00-10

Ladies and Gentlemen:

I am an engineer specializing in the area of LPTV stations and translators with particular emphasis on finding available channels and preparing FCC applications. I wish to address a few points which my experience indicates should be handled slightly differently than suggested in the NPRM and to offer concurrence with others.

Class A Protected Service Area

Since a station will achieve Class A status as a progression from ordinary LPTV or possibly translator status it would create endless confusion if the definition of protected area were changed.

§14 alludes to the possibility of, but does not propose milage separation criteria between Class A and NTSC TV stations. However, interference protection based on signal ratios is well established and has proven eminently workable. It is much preferable that a full service NTSC station that must protect a Class A station do so on the basis of interference ratios with the proviso that the full service stations can accept interference from the Class A station. While the LPTV Branch's LPONE analysis program was designed to predict whether an LPTV station would cause interference, its report can be interpreted the other way to answer whether the full service application will violate the allowable ratios.

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§16 raises the question of Class A to Class A protection. I recommend that Class A states be considered a progressive step from a licensed LPTV station or possibly a translator and that the current LPTV to LPTV interference ratios continue to apply.

Class A Interference Protection

§26 of the NPRM points out that the Community Broadcasters Protection Act of 1999 provides that a Class A license or modification of such may not be granted where the station would cause interference to certain NTSC, DTV, LPTV, and TV Translator stations.

As an LPTV station in a position to progress to Class A status has already been through an interference analysis, there seems no need to present a new analysis demonstrating non-interference to the specified classes of station. An LPTV station with Class A status which wishes to increase its facilities would be subject to the same interference analysis as a non-Class A station so the whole matter appears moot.

Market Area of a Qualifying Low Power Television Station

§19 raises a question as to how to define market area in the context of locally produced programming, and suggests using the station's protected service area. The contours that define protected area are higher in value than the protected contour value for full service stations. The encompassed area is correspondingly less. The Grade B contour of a full service station defines its protected contour and in the absence of specific terrain features that cause shielding, provides a quite good delineation of its service area. The field strength values that define the Grade B contours of full service stations would provide a fairer and more realistic definition of the service area for the purpose of defining where qualifying local origination would take place. I recommend that the market area for this purpose be the area inside the following contours:

Channels 2 through 6	47 dBu
Channels 7 through 13	56 dBu
Channels 14 through 69	64 dBu

Class A Applications

§43 raises the question of whether Class A LPTV stations should be governed by rules in Part 73 or Part 74 of the Commissions broadcast rules. As Class A stations progress from regular LPTV stations and will be very much regulated by the interference rules and quite possibly the technical standards applicable to non-Class A LPTV and translator stations it is more logical to consider Class A status as an augmentation of a regular LPTV station and keep their regulation in Part 74.

Minor Change Definition

The present minor change definition is extremely restrictive and many necessary changes have been possible only through the granting of Special Temporary Authorizations. The proposed relaxation of the definition is a step in the right direction, but changes in location should also be permitted. The recent change to the FM translator rules allowing a change in location as a minor change as long the new protected contour continues to provide service to some portions of the previously protected service area establishes a definition which I recommend in this case.[1]

As a more flexible definition of minor change is long overdue, any improved definition should also apply to non-Class A LPTV stations and translators.

Technical Characteristics of Class A Station Transmitters

Again recognizing that Class A status is gained as a progression from a licensed and satisfactorily operating LPTV station there seems to be no reason to require more stringent technical standards.

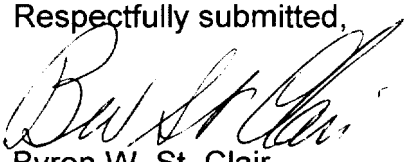
As an extreme example - an LPTV station which was built under the old rules regarding transmitter power and is thus still using a ten watt transmitter would have to significantly up-grade its transmitter.

[1] See §74.1233(a)(l)

Specifically the frequency tolerance would have to be improved from 0.02%[2] of its frequency to +or -1 kHz and the spurious products would have to be reduced from -50dB to -60dB. As the station is providing satisfactory service to begin with there seems to be no benefit to the public from imposing more stringent technical standards upon transition to Class A.

The certification process is not burdensome and provides more protection to the LPTV station owner and to other stations that could receive interference from a transmitter that was not performing to the standards in the rules. Accordingly it is recommended that the certification requirement be retained.

Respectfully submitted,



Byron W. St. Clair

[2]0.02% at channel 2 is 11 kHz and at channel 13 is 43 kHz.